

April 25, 2005

Dear National Organic Standards Board:
In regards to organic Pasture Requirements.

I did not become an organic dairy farmer because I was a rotational grazer or was planning to be one. I became an organic crop and dairy farmer because I wanted to grow my crops as healthy and safely as I could. Since that time, I feel that I have learned how to grow very good crops that I can harvest and store to feed my animals. I also feel that my animals have responded very well to these feeds and are productive, healthy animals. I do provide pasture to all my animals over six months of age from May to the end of October. But I do not depend on the pasture to supply over 30% dry matter intake. I depend on the pasture to have a place where my animals can enjoy roaming around and laying outdoors. This is natural behavior to them and I believe in letting them have access to pasture as much as possible.

If you want a quality organic product, I believe I can provide it to you from my own feed. If I had to convert more of my rotational cropland to pasture, I would not have enough of my own grain to provide energy to my animals and would have to buy more feeds. I like being able to grow enough crop for my own animals without having to buy any.

Sincerely,

Paul K Linkner